

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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WILMER SILVEVIO ZUNIGA,

Plaintiff,  
-against-

AM FRAMING LLC, and ARTHUR M. BELEM,  
as an individual,

**NOTICE OF MOTION**

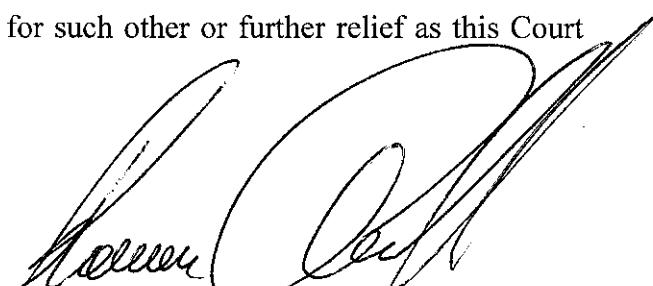
**2:21-cv-08250 (KM)(LDW)**

Defendants.

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**PLEASE TAKE NOTICE**, that upon the Affirmation of Roman Avshalumov, Esq., dated December 1, 2021 together with supporting Exhibits A though F annexed hereto, and the accompanying Memorandum of Law submitted in support of this motion, and upon all prior pleadings and proceedings heretofore had herein, the undersigned, on behalf of Plaintiff, will move this Court before The Honorable Kevin McNulty, United States District Judge at the United States District Court for the District of New Jersey, located at the Martin Luther King Building, 50 Walnut Street, Newark, New Jersey 07102 on the 14<sup>th</sup> day of December, 2021, at 9:30 AM of that day, or as soon thereafter as the parties may be heard, for an Order granting Plaintiff's Motion for entry of a Default Judgment against Defendants, **AM FRAMING LLC**, and **ARTHUR M. BELEM, as an individual**, and for such other or further relief as this Court deems just, proper, or equitable.

Dated: Kew Gardens, New York  
December 1, 2021



Roman Avshalumov, Esq. (RA 5508)  
Helen F. Dalton & Associates, P.C.  
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Kew Gardens, New York 11415  
Telephone: (718) 263-9591

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Civil Docket No.: **2:21-cv-08250 (KM)(LDW)**

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WILMER SILVEVIO ZUNIGA,

Plaintiff,  
-against-

AM FRAMING LLC, and ARTHUR M. BELEM, as an individual,

Defendants.

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**NOTICE OF MOTION FOR A DEFAULT JUDGMENT AGAINST**  
**AM FRAMING LLC, and ARTHUR M. BELEM, as an individual**

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HELEN F. DALTON & ASSOCIATES, P.C.  
*Attorneys for Plaintiff WILMER SILVEVIO ZUNIGA*  
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Kew Gardens, New York 11415  
Tel.: (718) 263-9591  
Fax: (718) 263-9598

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**WITH SERVICE TO:** *all defendants via:*

*Certified, United States First-Class Mailing to:*

**AM FRAMING LLC**  
7 Esther Street Newark  
New Jersey 07105

20 Longworth Street  
Newark, New Jersey 07102

*And United States First-Class Mailing to:*

**ARTHUR M. BELEM**  
7 Esther Street Newark  
New Jersey 07105

160 White Street, 2<sup>nd</sup> Floor  
Danbury, CT 06810

*(See Affidavit of Service of all motion  
papers filed herewith.)*